

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>v.</b>	)	<b>Cr. No. 1:21-10049-JDB-01</b>
	)	
<b>ALEXANDER ALPEROVICH, M.D.</b>	)	

**POSITION OF PARTIES WITH RESPECT TO SENTENCING FACTORS**

Comes the defendant, Alexander Alperovich, M.D., through counsel, pursuant to LCrR 32.1(d), and submits this Position of Parties with Respect to Sentencing Factors.

Counsel for Dr. Alperovich has conferred with counsel for the government and with the United States Probation Office about the Presentence Investigation Report (Doc. 8).

Counsel for Dr. Alperovich related to the United States Probation Office and counsel for the government that Dr. Alperovich is working on the financial disclosure forms and corresponding materials for the Probation Office. Additionally, since the filing of the Presentence Investigation Report, Dr. Alperovich has provided a written statement of acceptance to the Probation office (Doc. 8, p. 18), and understands that Probation Office will supplement or amend the Presentence Investigation Report with Dr. Alperovich's statement of acceptance and financial information.

After reviewing the report and discussing it with counsel, Dr. Alperovich provides notice to the Court that he has no objections to the sentencing guidelines calculations in the current Presentence Investigation Report (Doc. 8), other than the provision concerning acceptance of responsibility.

Dr. Alperovich intends to file a motion for downward departure and variance from the initial sentencing guidelines range. It is anticipated that the sentencing hearing will last more than

30 minutes, and Dr. Alperovich may present evidence through more than 1 witness. *See* LCrR 32.1(d).

Respectfully submitted,

***RITCHIE, DAVIES, JOHNSON & STOVALL, P.C.***

/s/Stephen Ross Johnson

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### **CERTIFICATE OF SERVICE**

I hereby certify that on September 1, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/Stephen Ross Johnson